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9 *Attorneys for Federal Defendants*

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11 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

12 BARTELL RANCH LLC, *et al.*,
13 Plaintiffs,

14 v.

15 ESTER M. MCCULLOUGH, *et al.*,
16 Defendants.

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18 Case No. 3:21-cv-80-MMD-CLB
Related Case No. 3:21-cv-103-MMD-
CLB
(Consolidated)

19 WESTERN WATERSHEDS
PROJECT, *et al.*,
Plaintiffs,

20 v.

21 UNITED STATES DEPARTMENT
22 OF THE INTERIOR, *et al.*,
Defendants.

23
24 **FEDERAL DEFENDANTS'**
UNOPPOSED MOTION FOR
EXTENSION OF TIME

25
26 **(FIRST MOTION)**

1 Federal Defendants respectfully request an extension of time to respond to two
2 non-dispositive motions recently filed by Intervenor-Plaintiff Reno Sparks Indian
3 Colony (RSIC) and Plaintiffs Bartell Ranch LLC and Edward Bartell (the Bartell
4 Plaintiffs). Neither proposed extension would alter the timeline for resolution of
5 dispositive motions in this case.

6 First, on April 4, 2022, RSIC filed a motion seeking sanctions under Fed. R.
7 Civ. P. 37(b) and 28 U.S.C. § 1927. ECF No. 200. Under Local Rule 7-2(b), Federal
8 Defendants' deadline for responding to that motion is Monday, April 18, 2022. To
9 accommodate the press of other litigation matters, as well as the schedules of those
10 within the Department of Justice who must review a response to such a motion,
11 Federal Defendants request a short, 4-day extension of this deadline to Friday,
12 April 22, 2022. Counsel for Federal Defendants have conferred with counsel for
13 RSIC, who stated that RSIC does not oppose this extension.

14 Second, on April 5, 2022, all Plaintiffs and Intervenor-Plaintiffs filed their
15 motions for summary judgment. ECF Nos. 202–205. In addition, the Bartell Plaintiffs
16 filed a motion asking the Court to consider extra-record evidence in connection with
17 their summary judgment motion. ECF No. 207. Under Local Rule 7-2(b), Federal
18 Defendants' deadline for responding to that record-related motion is April 19, 2022.
19 Federal Defendants request an extension of this deadline, such that their response is
20 due on May 20—at the same time as their response to the Bartell Plaintiffs' motion
21 for summary judgment—so that Federal Defendants may coordinate their responses
22 to these two related motions. Counsel for Federal Defendants have conferred with
23 counsel for the Bartell Plaintiffs, who stated that the Bartell Plaintiffs do not oppose
24 this extension.

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In sum, Federal Defendants respectfully request the following extensions of deadlines for non-dispositive motions pending in this case:

- That their deadline for responding to ECF No. 200 be extended from April 18, 2022 to April 22, 2022; and
 - That their deadline for responding to ECF No. 207 be extended from April 19, 2022 to May 20, 2022.

Respectfully submitted this 8th day of April, 2022.

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/s/ Arwyn Carroll
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